

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL R. THOMAS, individually)	CASE NO. 1:12CV2443
and on behalf of others similarly)	
situated,)	
)	JUDGE DAN AARON POLSTER
Plaintiff,)	
)	
v.)	Defendant Intellicorp Records,
)	Inc.’s Motion for Admission of
INTELLICORP RECORDS, INC.,)	Gina Caruso Pro Hac Vice
)	
Defendant.)	

Defendant Intellicorp Records, Inc. (“Intellicorp”) moves this Court to admit Gina Caruso of the law firm of Davis Polk & Wardwell LLP, *pro hac vice*, so that she may serve as co-counsel for Intellicorp in this matter. In accordance with Local Rule 83.5(h) Intellicorp states as follows:

1. Ms. Caruso is an active member in good standing of the Bars of the States of Connecticut and New York, without any restriction on her eligibility to practice. Ms. Caruso is admitted to practice before the Connecticut Supreme Court and New York State Court of Appeals. Ms. Caruso has been a member in good standing since she was first admitted to practice law in Connecticut on November 15, 1996 and New York on October 27, 1997. Ms. Caruso's state bar registration numbers are: 412934 (Connecticut) and 2851814 (New York).

2. Ms. Caruso's address, telephone number, facsimile number, and e-mail address are as follows:

450 Lexington Avenue, New York, NY 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
E-mail: gina.caruso@davispolk.com

3. Ms. Caruso has never been disbarred, suspended, or otherwise reprimanded by the bar of any state or of any other jurisdiction.

4. The declaration of Ms. Caruso in support of this Motion for Admission *Pro Hac Vice* is attached as Exhibit A pursuant to Local Rule 83.5(h).

5. The *pro hac vice* admission fee is being paid contemporaneously with the filing of this motion.

Intellicorp, therefore, respectfully requests that this Court permit Gina Caruso of the law firm of Davis Polk & Wardwell LLP, to appear on its behalf in this proceeding *pro hac vice*.

Date: December 20, 2012

Respectfully submitted,

/s/Michael J. Zbiegien, Jr.
David H. Wallace (0037210)
dwallace@taftlaw.com
Gregory J. O'Brien (0063441)
gobrien@taftlaw.com
Michael J. Zbiegien, Jr. (0078352)
mzbiegien@taftlaw.com
Taft Stettinius & Hollister LLP
200 Public Square, Suite 3500
Cleveland, Ohio 44114-2302
Tel: (216) 241-2838
Fax: (216) 241-3707

*Attorneys for Defendant Intellicorp
Records, Inc.*

CERTIFICATE OF SERVICE

The foregoing was filed through the Court's electronic filing system this 20th day of December, 2012. Notice of this filing will be sent to all parties listed on the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael J. Zbiegien, Jr.

Attorney for Defendant
Intellicorp Records, Inc.

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